

## Cancer Research UK response to Research Integrity Office Code of Practice for Research

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### **Introduction**

Cancer Research UK greatly welcomes the opportunity to respond to this consultation.

Cancer Research UK is the world's largest independent organisation dedicated to cancer research. Our vision is that together we will beat cancer. We funded £333 million of research in 2007-08. Cancer Research UK funds research into all aspects of cancer from exploratory biology to clinical trials of novel and existing drugs as well as population-based studies and prevention research. We carry out world-class research to improve our understanding of cancer and to find out how to prevent, diagnose and treat different types of the disease.

### **General comments**

Paragraph 1.8 explains that the word 'organisation' covers many sorts of research organisation. Cancer Research UK both awards grants to universities and employs researchers in its own institutions. In the former case we will expect the host institution to ensure compliance with local codes of practice, and in the latter we have our own policies. Having a single organisational code of practice for these two very different roles might not be helpful.

The following comments relate only to Cancer Research UK's role as a grant funder.

**1. Recognising that codes of practice can only form a part, though an important one, of efforts to promote good practice in research, do you think that the Code has the potential to help:**

**a. Organisations and researchers to understand better the principles and standards of good practice in research?**

**b. Organisations to understand better their responsibilities in promoting and supporting a culture of good practice in research?**

Because the definition of 'organisation' is so broad (see general comments, above), it is not clear whether this document expects research funders to create their own standards and ask their grantees to abide by them. We do not think that having multiple funders creating different standards which researchers and their host institutions have to follow is the way forward.

**c. Researchers to consider the wider consequences of their work and to engage critically with good practice in research, rather than treating codes of practice such as this as just another procedure to be followed?**

**2. Do you consider that there are any omissions in the Code?**

Section 4.14 – peer review

We note that this section focuses entirely on peer review for journal articles. Peer review of grant applications is just as crucial a step in the maintenance of high-integrity research. For research funders, the decision to award a grant is the major point at which we can influence the direction of the project. For instance, Section 4.4.1 would provide a good checklist for the sort of questions we expect our peer reviewers to answer. We fully appreciate our responsibility to ensure good practice at this stage, and peer review is a vital part of this decision-making.

**3. Would your organisation(s) consider using the Code when drafting or revising your own, more detailed, codes of practice? Please list the reason(s) for your decision, including whether they are specific to your organisation or of more general principle.**

Yes, as a provider of research grants we would use this document. We would not use it to set up our code of practice for research, but we would use it to cross-check that we have addressed all the issues we need to in the Terms and Conditions of our funding.

At present, our Terms and Conditions place the responsibility for ensuring that the research fulfils all necessary ethical and regulatory requirements on the host institution. We reserve the right to request documentary evidence that such requirements have been met.

**4. How does the Code compare to any existing mechanisms for promoting good practice in research at your organisation? Are there elements of the Code that are better or worse than your current system(s)?**

**5. Would you want other organisations to use the Code?**

Cancer Research UK relies on its host institutions having effective procedures for ensuring high-quality and high-integrity research. We would therefore welcome any work you are doing to promote and standardise good practice across UK institutions.

**6. Regarding the Recommended Checklist for Researchers (section 3.0, page 3):**

**a. Should this checklist include a requirement for signing off and verification that its contents have been understood and complied with by the researcher?**

We can see why this might be attractive, but it might go against your stated aim of not micromanaging research (paragraph 1.2).

**b. Would a similar checklist for organisations be useful? If so, should this be a checklist for staff responsible for the governance of a research project or a checklist for organisational systems and policies to ensure good practice in research? Or both?**

Yes, this would be useful, but it would be important to define what you mean by 'organisation'. There will be different things to consider depending on whether the organisation was awarding grants or employing researchers.

**7. Any other views that you have on the Code, its principles, its standards, or any of its other components would also be most welcome.**

Section 4.1.2 and 4.7.1 – collaborations

We agree that UK researchers should always abide by UK regulations, irrespective of what their overseas collaborators might be required to do. However, we were not clear whether the Code of Practice was implying that work done in other countries as a result of collaborations with UK-based research should also comply with UK requirements. Section 4.5.3 asks only that researchers are 'aware' of the standards in other countries. There are two specific questions the Code might address:

- Where other countries have different requirements (such as, for instance, for work with animals or for clinical trials), what is this Code of Practice requiring of the work done by those overseas collaborators in their home countries?
- Where funding originating from the UK is used to carry out work overseas (such as through a grant holder outsourcing parts of their research project) should that overseas work be subject to UK regulations and good practice?

Section 4.6 – conflicts of interest

As with peer review (see answer to Q2) this section relates only to conflicts within organisations that host research. As a grant funder, we have to abide by strict guidelines relating to conflicts of interest for members of our peer review committees.

We would be happy to provide any further information or detail as required. Please contact Emma Greenwood, Science Policy Researcher at [emma.greenwood@cancer.org.uk](mailto:emma.greenwood@cancer.org.uk) or on 0207 061 8358.